

**BRAIN INJURY
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July 20 2022

Via ECF

Hon. Stewart D. Aaron
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States of America, ex rel. Patrick Donohue v. Carranza, et al*
1:20-cv-05396 (GHW)(SDA)

Dear Judge Aaron,

The undersigned represents the Plaintiff-Relator in the above-captioned case. Pursuant to Your Honor's grant of counsel's May 18, 2022, Letter Motion requesting a revised briefing schedule applicable to the anticipated motions to dismiss, the deadline for filing motions to dismiss is June 30, 2022, with a response deadline of July 22, 2022. (ECF 153).

Five motions were in fact filed, by: (1) New York City Department of Education and Richard Carranza and Meisha Porter; Board of Education of the City of Chicago and Jose M. Torres, Ph.D.; and Los Angeles Unified School District and Austin Beutner; (2) Wake County Public School District and Cathy Quiroz Moore; (3) Stamford Board of Education and Dr. Tamu Lucero; (4) Somerville Public School District and Mary Skipper; and (5) San Diego Unified School District, Dr. Lamont A. Jackson, and Cindy Marten. The responses to these five separate motions all are due on July 22, 2022.

The undersigned, counsel of record for Plaintiff-Relator, has tested positive for COVID-19. Rory Bellantoni, also counsel of record for Plaintiff-Relator, also has fallen ill, with the results of a COVID test currently pending.

In light of counsel's unavailability due to illness, the undersigned hereby requests that this Court grant a 21-day extension of time to file the responses to the five pending motions to dismiss. The new deadline would be August 12, 2022. Counsel for Plaintiff-Relator has consulted with counsel for the above-listed Defendants, who do not object to the relief sought herein. Further, after consultation, the undersigned and counsel for the above Defendants hereby jointly request a deadline of September 16, 2022, for all replies. This is the first request for an extension of the response deadline.

The Plaintiff thanks the Court for its attention and courtesies herein.

Respectfully,

/s/
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